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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

JOEL DE HARO GONZALEZ, } Case No.: 1:24-cv-00222-KES-CDB
Plaintiff, } STIPULATION AND [PROPOSED] ORDER
vs. } FOR AN EXTENSION OF TIME
MARTIN O'MALLEY, }
Commissioner of Social Security, }
Defendant. }

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Complaint be extended thirty (30) days from April 22, 2024, up to and including May 22, 2024. This is the Defendant's first request for an extension.

Defendant makes this request in good faith and for good cause, with no intent to delay proceedings unduly. The certified administrative record in this case is not yet available. Although Defendant is requesting an extension to May 22, 2024, counsel will aim to file the certified administrative record before that date if it is available before then.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

/s/ Jonathan Peña*

(*as authorized via e-mail on Apr. 18, 2024)
JONATHAN PEÑA
Attorney for Plaintiff

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By: /s/ Christopher Vieira
CHRISTOPHER VIEIRA
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including May 22, 2024, to respond to Plaintiff's Complaint.

DATED: April 19, 2024

HON. CHRISTOPHER D. BAKER
UNITED STATES MAGISTRATE JUDGE